

### **REMARKS/ARGUMENTS**

Claims 57 through 94 are pending in this application. Applicants note with appreciation that the Office Action (Action) indicates that claims 57 through 64 and 81 through 88 are allowed. In addition, Applicants note with appreciation that the Action indicates that claims 65, 73 and their dependents would be allowable if rewritten or amended to overcome the rejections under 35 USC §112, 2<sup>nd</sup> paragraph. To this end, claims 65 and 73 have been amended. Support for these amendments can be found at least on page 20, lines 7 through 27.

Claims 65 and 73 stand rejected under 35 USC §112, 2<sup>nd</sup> paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter, which Applicants regard as the invention. In particular, the Action contends that the chemical formulas are unclear, as m and n are not defined. Applicants respectfully submit that claims 65 and 73 have been amended to define a ratio for m and n. Therefore, m and n are now defined in such a manner that renders claims 65 and 73 definite. As such, reconsideration and withdrawal of the §112, 2<sup>nd</sup> paragraph rejection are respectfully requested.

Claims 89 through 94 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 3,629,922 to Miller et al. (Miller).

Miller describes plastics that are plated with metals by pretreatment of the entire plastic surface with a phosphorous compound followed by contacting the treated surface with a metal salt or complex thereof. The entirety of the resultant surface is capable of being electroplated by conventional techniques.

Claim 89 recites an article of manufacture comprising a substrate having a metal coating over portions of the substrate in a selected pattern and being bonded to the substrate through an intermediate layer of catalyzed ligating chemical agent.

To anticipate a claim, the reference must teach every element of the claim. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Applicants respectfully maintain that Miller fails to anticipate the claimed invention in that Miller clearly fails to disclose each and every element as set forth in claim 89. Specifically, Miller clearly fails to disclose an article of manufacture comprising a substrate having a metal coating over portions of the substrate in a selected pattern, as recited in claim 89.

The Action contends that since Miller's plated article is useful in printing circuits (relying on col. 1, lines 16-19 of Miller) it is clear that the metal is a patterned coating. Applicants respectfully disagree, as there is absolutely no disclosure or suggestion in Miller, let alone at col. 1, lines 16-19, that the metal is a patterned coating, contrary to the Action's contention. Therefore, it follows that Miller clearly fails to disclose or suggest a coating over portions of the substrate in a selected pattern, as recited in claim 89.

Moreover, Applicants respectfully submit that Miller clearly never even contemplated an article of manufacture comprising a substrate having a metal coating over portions of the substrate in a selected pattern, as recited in claim 89. This is evidenced by the fact that throughout the Miller patent, Miller appears to have carefully delineated all aspects of their invention, including numerous chemical components, substrates, and treatment parameters, such as, times, temperatures, and pH values, and further exemplifies their invention with eight (8) examples. Notably absent from this detailed disclosure and the eight (8) examples in Miller are the claimed features recited in claim 89, especially the feature of a substrate having a metal coating over portions of the substrate in a selected pattern.

Therefore, Applicants respectfully submit that claim 89, as well as claims 90 through 94 dependent therefrom, are not anticipated by Miller. As such,

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Serial No.: 09/998,007

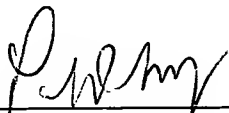
reconsideration and withdrawal of the §102(b) rejection are respectfully requested.

Applicants respectfully submit that all pending claims of the application are patentably distinguishable over the cited art taken alone or in combination.

Therefore, reconsideration and withdrawal of all of the rejections and passage of this application to allowance is respectfully requested.

December 5, 2005

Respectfully submitted,



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